BJ 3/22/94

Mid-Atlantic Finishing, Inc.
4656 Addison Rd.
Capitol Heights, Md. 20743

MDD 985386143

Date of inspection: March 11, 1994
Date of report: March 18, 1994

I. Introduction:

An unannounced inspection was done at this large quantity generator of hazardous waste. The inspection included evaluations of the facility's compliance with land disposal restriction requirements, toxicity characteristic leaching procedure (TCLP) requirements, and waste minimization requirements.

II. Representatives Present:

Michael Warner, Environmental Compliance Manager, Mid-Atlantic
Doug Frantz, inspector, HWED/MDE, (410) 631-3400

III. Facility Description:

This facility is an electroplater, plating a variety of metals including zinc, cadmium, chromium, gold, silver, tin, tin/zinc, nickel, and copper, in addition to chemical conversion coating of metals. All wastewaters generated in the plating processes are treated prior to discharge in accordance with pretreatment permit no. 07771, expiration date July 8, 1995, issued by the Washington Suburban Sanitary Commission.

IV. Hazardous Waste Generation:

During treatment of the plating wastewaters, two hazardous waste streams are generated. Cyanide and hexavalent chromium bearing rinsewaters are passed through an ion exchange system, and then returned to the rinse tanks for reuse. The ion exchange modules are periodically shipped offsite for regeneration under waste codes F006 and D007, using hazardous waste manifests.

The second hazardous waste stream from the treatment of plating wastewater is the sludge produced by the wastewater treatment unit, which is designed to destroy cyanide and precipitate metals. This sludge is dried on site, and packaged in one cubic yard woven polypropylene bags for shipment as F006 waste.

A minor waste stream is waste methyl ethyl ketone/acetone used to remove masking material from metal parts.

V. Non-hazardous waste:

DSF. quarterly

Treated wastewater is discharged to the sanitary sewer, with ~~monthly~~ sampling required for metals, cyanide, and pH. WSSC has access to a locked manhole for sampling at any time. MAF is required to sample for total toxic organics on one day per quarter.

VI. Hazardous Waste Management:

A) less than 90 day storage - F006 sludge is stored in one cubic yard bags, which hold the equivalent of about 3.7 55 gallon drums. Three bags were in storage, with the earliest accumulation date being Jan. 5, 1994. The last shipment of this waste was on Dec. 20, 1993. Mr. Warner maintains an inspection log for the weekly inspections of the storage area. I requested that he begin noting the time of each inspection on the inspection log. Ion exchange modules are not stored before shipment, but are left in service until the regenerated modules are returned, then immediately shipped for regeneration.

0001

B) satellite storage - A 55 gallon drum is used to accumulate waste MEK/acetone and was properly labeled and closed.

VII. Record Keeping:

A) Hazardous waste manifests - Manifests were on file for the previous three years as required, along with land disposal restriction notifications. The F006 sludge is now shipped to Horsehead Resources Development Co., Inc. (Tennessee) where it is recycled for its metals content. Even though it is recycled, manifests and land disposal restriction notifications must be used.

B) Annual reports - Annual reports on file as required.

C) Contingency plan - The plan is satisfactory, although Mr. Warner was notified of a change in the MDE Emergency Response phone number.

0002

D) Training records - Mr. Warner is a licensed Wastewaterworks Operator and has received training in RCRA regulations. As the Environmental Compliance Manager, he is the sole person responsible for handling of the hazardous waste. Although the documents required by COMAR 26.13.05.02G were not prepared, Mr. Warner prepared the required job title, job description, and training requirement for his position and transmitted it to me on March 16, 1994.

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VIII. Waste Minimization:

MAF has a written waste minimization program and a copy was provided for the file. Procedures used include electrolytic recovery on the cadmium, zinc, and silver drag-out tanks, flow restrictors on all rinse tanks, recycling of certain rinsewaters through the ion exchange system, and drying of the wastewater treatment system sludge.

IX. TCLP Evaluation:

The hazardous waste stream (F006) has been analyzed by the TCLP method and a copy of the analysis was on file.

X. Violations:

The documents required by COMAR 26.13.05.02G (training) were not prepared, but this has already been corrected.

copy received_____

STATE OF MARYLAND
DEPARTMENT OF THE ENVIRONMENT
HAZARDOUS AND SOLID WASTE MANAGEMENT ADMINISTRATION
ENFORCEMENT PROGRAM
2500 BROENING HIGHWAY
BALTIMORE, MARYLAND 21224
(410) 631-3400

FI 940311 PG 023 Inspector: D. Frantz Date: March 11, 199

GENERATOR CHECKLIST

Facility Name: Mid-Atlantic Finishing, Inc.

Address: 4656 Addison Rd. Capitol Heights, Md. 20743

Facility Representative: Mike Warner Telephone No.: (301) 322-223

Description of Work Activity: electroplating, metal finishing

EPA Identification Number? M-D-D-9-8-5-3-8-6-1-4-3

Section A - Hazardous Waste Determination

1. Does facility generate hazardous waste(s) as defined in COMAR 26.13.02.10 - .19?..... ✓ Yes ___ No
   If yes, under which catagory is the waste?

   ___ Ignitable ___ Corrosive ___ Reactive ___ EP Toxic ✓ RCRA Listed

2. Describe the amount of waste generated (day, week or month).
   ~1 cubic yard F006 sludge per month.

Section B - Manifest (26.13.03.04)

1. Does generator ship waste off-site?..... ✓ Yes ___ No
   (If no, do not complete sections B and C)
2. Does generator use manifest?..... ✓ Yes ___ No
   If no, explain: ___
3. Does generator retain copies of manifests?..... ✓ Yes ___ No
   If yes, does the manifest include the following information?
   (26.13.03.04C)
   - -Manifest document number?..... ✓ Yes ___ No
   - -Generator's name, mailing address and telephone number?..... ✓ Yes ___ No
   - -Generator's EPA I.D. number?..... ✓ Yes ___ No
   - -Transporter name(s) and EPA I.D. number(s)?..... ✓ Yes ___ No
   - -Designated TSDF name, address, and EPA I.D. number?..... ✓ Yes ___ No
   - -Alternate TSDF name, address, and EPA I.D. number?..... ___ Yes ✓ No
   - -Instructions to return waste to generator if undeliverable?..... ✓ Yes ___ No
   - -Description of the waste required by DOT regulations?..... ✓ Yes ___ No

-Quantity of each hazardous waste by units of weight or volume?....___Yes___No___N/A
-Total number and types of containers given to transporter?.....___Yes___No___N/A
-Is the proper certification noted on each manifest?.....___Yes___No___N/A

4. Has the generator signed and dated manifests (26.13.03.04E)?.....___Yes___No___N/A
5. Did the generator obtain initial transporter's signature and date of acceptance?.....___Yes___No___N/A
6. Do returned copies of manifest include facility owner/operator signature and date of acceptance?.....___Yes___No___N/A
7. Have manifests been retained for three years?.....___Yes___No___N/A

Section C - Pre-Transport Requirements (26.13.03.05) ___N/A

1. Does generator package wastes in accordance with DOT requirements?....___Yes___No
2. Are containers in good condition?.....___Yes___No
   If no, explain:_____
3. Is the date that accumulation time began clearly marked and visible for inspection on each container?.....___Yes___No
4. Is period of accumulation less than 90 days?.....___Yes___No
   -If no, is amount accumulated less than 500 kg or less than 1 kg of acute hazardous waste?.....___Yes___No___N/A
   -If no, explain:_____
5. Is "SATELLITE ACCUMULATION" no more than 55 gallons of hazardous waste or 1 quart of acutely hazardous waste?.....___Yes___No___N/A
6. Are containers in good condition, closed, and clearly marked "HAZARDOUS WASTE"?.....___Yes___No___N/A

Section D - Recordkeeping and Reporting (26.13.03.06)

1. Does the generator keep the following reports for three years?
   -Manifests and signed copies from designated facilities?.....___Yes___No
   -Annual Reports?.....___Yes___No
   -Exception Reports?.....___Yes___No___N/A
   -Waste Analyses?.....___Yes___No___N/A

Section E - Special Conditions (26.13.03.07)

1. Has the generator received from or transported to a foreign country any hazardous waste(s)?.....___Yes___No
   -If yes, has a notice been filed with MDE and EPA?.....___Yes___No___N/A
   -Is this waste manifested and signed by a foreign consignee?.....___Yes___No___N/A
   -If generator transported wastes out of the country, has confirmation of delivery been received?.....___Yes___No___N/A

Section F - General Requirements (26.13.03.05E)

Personnel Training (26.13.05.02G)

1. Does the owner/operator maintain personnel training records?.....___Yes___No
   If yes, do they include:
   -Job title and written job description of each position?.....___Yes___No
   -Description of type and amount of training?.....___Yes___No
   -Records of training given to facility personnel?.....___Yes___No

Preparedness and Prevention (26.13.05.03)

1. Is there evidence of fire, explosion, or contamination of the environment?.....___Yes___No

2. Is the facility equipped with:
   a. Internal communication or alarm system?.....___Yes___No
   b. Telephone or two-way radio to call emergency response personnel?.....___Yes___No
   c. Portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment?.....___Yes___No
   d. Water of adequate volume for hoses, sprinklers, or water spray system?.....___Yes___No
3. Is there sufficient aisle space to allow unobstructed movement of personnel and equipment in an emergency?.....___Yes___No
4. Has the owner/operator made arragements with the local authorities to familiarize them with characteristics of the facility?.....___Yes___No
5. In the case that more than one police or fire department might respond, is there a designated primary authority?.....___Yes___No
6. If State or local authorities decline to enter into these arrangements,, has this been documented in the operating log?.....___Yes___No___N/A

Contingency Plan and Emergency Procedures (26.13.05.04)

1. Is a contingency plan maintained at the facility?.....___Yes___No
   If yes, does contingency plan include:
   -Arrangements with local emergency response organizations?.....___Yes___No
   -Emergency coordinators' names, phone numbers, and addresses?.....___Yes___No
   -List of all emergency equipment at the facility and description of equipment?.....___Yes___No
   -Evacuation plan for facility personnel?.....___Yes___No
2. Is there an emergency coordinator on site or on call at all times?....___Yes___No
3. Has a copy of the Contingency plan been submitted to local or State agencies that may be asked to provide emergency services?.....___Yes___No
4. Has the plan ever been implemented?.....___Yes___No
   -If so, was the plan appropriate?.....___Yes___No___N/A
   If the plan was <u>not</u> appropriate, has it been amended?.....___Yes___No___N/A
   -If the plan was implemented, was the incident recorded in the operating log and was a written report submitted to MDE?.....___Yes___No___N/A

Use and Management of Containers (26.13.05.09)

1. Are containers in good condition?.....___Yes___No
2. Is container made of a material that will not react with the waste which it stores?.....___Yes___No___N/A
3. Are containers always closed when holding hazardous waste?.....___Yes___No
4. Are containers handled so that they will not be opened, handled, or stored in a manner which may rupture them or cause them to leak?...___Yes___No
5. Does owner/operator inspect containers at least weekly for leaks and deterioration?.....___Yes___No
6. Do container storage areas have adequate containment systems?.....___Yes___No
7. Are containers holding ignitable and reactive waste located at least 15m (50 ft) from facility property lines?.....___Yes___No___N/A
8. Are incompatible wastes or materials placed in the same containers?...___Yes___No___N/A
9. Are hazardous wastes placed in washed, clean containers when they previously held incompatible waste?.....___Yes___No___N/A
10. Are incompatible hazardous wastes separated from each other by a berm, dike, wall, or other device?.....___Yes___No___N/A

Annual Reports (26.13.03.06B)

1. Does the facility submit annual reports to MDE?.....___Yes___No
   If yes, do reports contain the following information?
   a) Name, address and EPA I.D. number of facility?.....___Yes___No
   b) Date and year covered by report?.....___Yes___No
   c) Description/quantity of hazardous waste?.....___Yes___No
   d) Description of efforts to reduce volume/toxicity of waste generated, and actual comparisons with previous year?.....___Yes___No
   e) Certification signed by owner/operator?.....___Yes___No

Section G - Other Checklists Completed: ___N/A

_____ Tanks
_____ Transporter
_____ Land Disposal Restrictions
_____ TSD Facility
_____ Surface Impoundment
_____ Waste Pile
_____ Land Treatment
_____ Landfill
_____ Incinerator
_____ Thermal Treatment
_____ Groundwater Monitoring

Section H - Additional Comments

- No hazardous waste storage on facility.
- Training documentation not complete

II. WASTE IDENTIFICATION

A. List waste codes which the facility handles in each of the following LDR categories*:

1. F001 through F005 spent solvents (§268.30): _____

2. F020-F023 and F026-F028 dioxin-containing wastes (§268.31): _____

3. California List Wastes (§268.32) (See Appendix A): _____

4. First Third Wastes (§268.33): F006 (non-wastewater)

5. Second Third Wastes (§268.34): _____

6. Third Third Wastes (§268.35)**: _____

*See Appendix B.

** Note: Effective 09/25/90, large quantity generators and TSDs were required to use the toxicity characteristic leaching procedure (TCLP) instead of the extraction procedure (EP) for determining the toxicity characteristic (TC). Small quantity generators must comply with this new requirement by 03/29/91. The LDR applies to EP toxic wastes and not to "newly identified" wastes which exhibit TC. TC wastes will be regulated under 40 CFR Part 268 only after they have been designated with LDR treatment codes or standards. Even if the former EP waste is also TC characteristic, it is only subject to LDR if it continues to fail the EP. If it fails the TC, it will not be subject to LDR until EPA has established a new treatment standard.

B. Waste Code Determination

1. Have all waste codes been correctly identified for purposes of compliance with §§268.9 and 262.11.*

   Yes ✓ No____

   If no, list below:

   Assigned Classification Correct Classification

* Areas of concern (See Section 2.0) include: California List/waste categories with more stringent treatment standards; listed/characteristic; multi-source/single-source leachate; P and U waste codes/F and K wastes; and waste code carry through principle.

Comments:_____

2. Have both the listed and characteristic waste code been assigned, where a listed waste exhibits a characteristic? (§268.9(a))

Yes ✓ No ___ NA ___

Comments:_____

3. Is the waste classified as D001, non-High TOC Ignitable Liquids Subcategory? If so, has the waste been treated by INCIN, FSUBS, or RORGS? Has the generator determined the underlying hazardous constituents (as defined in §268.2) that are reasonably expected to be present in the waste? (§268.9(a))

Yes ___ No ___ NA ✓

Comments:_____

4. Is the waste classified as D002, and prohibited under §268.37? Has the generator determined the underlying hazardous constituents (as defined in §268.2) that are reasonably expected to be present in the waste?

Yes ___ No ___ NA ✓

Comments:_____

5. Has multi-source leachate been assigned the F039 waste code?* (§261.31)

Yes ___ No ___ NA ✓

* Leachate derived exclusively from F020-F023 and/or F026-F028 dioxin wastes retains the individual waste codes.

If yes, was single-source leachate combined to form multi-source leachate? (55 FR 22623)

Yes ___ No ___

Comments:_____

MDD 985386143

C. Does the facility handle the following wastes (national capacity variances)?

1. Debris contaminated with wastes that had treatment standards set in the Third Third rule based on incineration, mercury retorting, or vitrification. See Appendix A (expires - 05/08/94). (§268.5)

   Yes ___ No ✓ List_____

2. Inorganic solid debris as defined in §268.2(g)*; includes chromium refactory bricks carrying EPA Hazardous Waste Nos. K048-K052 (expires - 05/08/94). (§268.35(c))

   Yes ___ No ✓ List_____

   *Note: Incorrect reference (§268.2(a)(7)) in Third Third rule.

3. Debris contaminated with wastes listed in §268.12, and/or debris contaminated with any characteristic wastes for which treatment standards are established in Subpart D of Part 268 (expires 05/08/94). (§268.35(e)(1))*

   Yes ___ No ✓ List_____

   *Note: Generator must demonstrate a good faith effort to locate treatment capacity suitable for its waste, utilize such capacity if found available, or file a report as required by §268.5(g) by August 12, 1993 or within 90 days after the hazardous waste is generated (whichever is later) describing the generator's efforts to locate treatment capacity.

4. Mixed radioactive hazardous debris contaminated with wastes listed in §268.12 and mixed with radioactive hazardous debris contaminated with any characteristic waste for which treatment standards are established in 40 CFR Part 268, Subpart D (expires 05/08/94). (§268.35(e)(2))*

   Yes ___ No ✓ List_____

   *Note: Generator must demonstrate a good faith effort to locate treatment capacity suitable for its waste, utilize such capacity if found available, or file a report as required by §268.5(g) by August 12, 1993 or within 90 days after the hazardous waste is generated (whichever is later) describing the generator's efforts to locate treatment capacity.

III. GENERATOR REQUIREMENTS

A. Wastewater/Non Wastewater Category and Treatability Group/Treatment Standard Identification*

*Note: This information is generally available on LDR notifications. If not, waste profile data and other documentation should be checked.

1. F001-F005 Spent Solvent Wastes: Does the generator correctly determine the appropriate Wastewater/Non Wastewater Category and treatment standard for each F-solvent?

Yes ___ No ___ NA ✓

If available, list each waste code and check the correct treatability group.

Waste Code	Wastewater*	Non Wastewater

Comments _____

* Less than 1 percent by weight total organic carbon (TOC), or less than 1 percent by weight total F001- F005 solvent constituents listed in §268.41, Table CCWE. (§268.2(f)(1))

2. F020-F023 and F026-F028 Dioxin Wastes: Does the generator correctly determine the appropriate treatability group/treatment standard for each dioxin waste?

Yes ___ No ___ NA ✓

If yes, list each waste code and check the correct treatability group.

Waste Code	Wastewater*	Non Wastewater

Comments _____

* Less than 1 percent TOC by weight and less than 1 percent total suspended solids (TSS) by weight. (§268.2(f))

3. First, Second, and Third Third Wastes:

a. Does the generator correctly determine the appropriate treatability group/treatment standard for each waste?

Yes ✓ No ___ NA ___

NDD 985386193

If available, list each waste code and check the correct treatability group:

Waste Code	Subcategory	Wastewater*	Non Wastewater
F006			✓

* Less than 1 percent TOC by weight and less than 1 percent total suspended solids (TSS) with the following exceptions: K011, K013, and K014 wastewaters (as generated) -- less than 5 percent by weight TOC and less than 1 percent by weight TSS; K103 and K104 wastewaters (as generated) - less than 4 percent by weight TOC and less than 1 percent by weight TSS. (§268.2(f)(2) and (3))

Comments _____

b. Do the assigned treatment standards for listed wastes cover constituents that may cause the waste to exhibit any characteristics? (§268.9 (b))

Yes ✓ No ___ NA ___

c. Does the generator specify alternative treatment standards for lab packs?* (268.42(c))

Yes ___ No ___ NA ✓

*Use of the alternative treatment standards is not required. (55 FR 22629)

If yes, do lab packs only contain the following wastes?* (§268.42(c)(2))

___ Organometallics: Part 268, Appendix IV constituents
___ Organics: Part 268, Appendix V constituents

* Unregulated wastes and hazardous wastes which meet treatment standards may be commingled in the appropriate Appendix IV and V lab pack. (55 FR 22629)

d. Does the generator specify the treatment standards for the relevant F039 multi-source leachate constituents?*

Yes ___ No ___ NA ✓

*Use of the alternative treatment standards is required. (55 FR 22619)

4. California List Wastes: Has the generator correctly identified the wastewater/non wastewater category and treatment standard/prohibition level for the following wastes? (55 FR 22675)

a. Liquid hazardous wastes containing PCBs ≥50 ppm (268.32(a)(2))

Yes ___ No ___ NA ✓

If yes, check the appropriate category (treatability group) (see §268.42(a)(1)):

___ 50 to 500 ppm PCBs
___ ≥500 ppm PCBs

b. Listed or characteristic wastes containing ≥1,000 mg/l (liquids) or ≥1,000 mg/kg HOCs, (non-liquids), which are not declared hazardous by the HOC content (55 FR 22675)

Yes ___ No ___ NA ✓

If yes, check the appropriate category (see §268.42(a)(2)):

___ Dilute HOC wastewater with 1,000 mg/l to 10,000 mg/l HOCs) (268.32(a)(3))
___ All other HOCs greater than or equal to the prohibition level of 1,000 mg/l (liquids) or mg/kg (non-liquids) (268.32(e)(1) and (2))

c. Liquid hazardous wastes that exhibit a characteristic and also contain ≥134 mg/l nickel and/or ≥130 mg/l thallium (55 FR 22675)

Yes ___ No ___ NA ✓

5. National Capacity Variance Wastes: Have all applicable California List prohibitions been identified for wastes covered under national capacity variances? (See Appendix A.)

Yes ___ No ___ NA ✓

If a waste stream contains a mixture of wastes, and a variance only applies to some of the waste codes, has the generator identified all applicable treatment standards and California List prohibitions? (See Appendix A.)

Yes ___ No ___ NA ✓

If California List prohibitions apply to wastestreams managed by the generator, complete the following table for each waste code, noting the date on which relevant national capacity variances expire.

Waste Code	Cal. List Applicability	Expiration Date
_____	_____	___/___/___
_____	_____	___/___/___
_____	_____	___/___/___

Comments: _____

MDD 985 386 143

6. Treatment standards expressed as required technologies: Has the generator specified an alternative method to that required in §268.42?

Yes ___ No ___ NA ✓

If yes, list the waste code, the technology specified in §268.42, the alternative method, and documentation of approval. (§268.42(b))

Waste Code	Required Technology	Alternative Method	Approval

Comments _____

7. Does the generator mix multiple restricted wastes all containing a common constituent of concern, but which have different treatment standards?

Yes ___ No ✓

If yes, did the generator select the most stringent treatment standards? (§§268.41(b) and 268.43(b))

Yes ___ No ___

Comments _____

B. Waste Analysis

1. Does the generator determine whether restricted wastes exceed treatment standards/prohibition levels at the point of generation?* (§268.7(a) (53 FR 31208))

Yes ✓ No ✓

* Note: This determination may be made at the point of disposal if the waste only has a prohibition level in effect (52 FR 25765).

If no, does the generator ship all restricted wastes as not meeting treatment standards?

Yes ✓ No ___

Comments _____

2. Which of the following analytical methods does the generator employ?*

*Note: A "No" answer to applicable questions b through d does not necessarily constitute a violation. However, knowledge of waste is rarely adequate if a generator certifies that treatment standard criteria have been met.

a. Knowledge of waste:

Yes ✓ No ___

If yes, list the wastes for which applied knowledge was used and describe the basis of determination. Attach documentation. (§268.7(a)(5))

F006 – analyzed in 1991, process generating waste has not changed.

b. TCLP*: Are wastes with treatment standards specified in §268.41 analyzed using TCLP?** (BDAT*** = stabilization/immobilization technology)

Yes ✓ No ___ NA ___

*TCLP = Toxicity Characteristic Leaching Procedure (Part 268, Appendix I, EPA Test Method 1311).

**See Section 268.40(a) for options for using TCLP or EP test methods.
***BDAT = best demonstrated available technology. See Appendix A.

If yes, list the wastes for which TCLP was used and provide the date of last test, identify the frequency of testing, and note any problems. Attach test results. (§268.7(a)(5))

F006 – tested June '91 – ~~EP~~ TCLP metals

c. Total constituent analysis: Are wastes with treatment standards specified in §268.43 analyzed using total constituent analysis?* (BDAT = destruction/removal technology)

Yes ✓ No ___ NA ___

*See Appendix C for exceptions.
If yes, list the wastes for which total constituent analysis was used and provide the date of last test, identify the frequency of testing, and note any problems. Attach test results. (§268.7(a)(5))

F006 – total + amenable cyanide – June '91

MDD 985386143

d. Is the paint filter liquids test (PFELT) used to determine if California List wastes are *liquid* hazardous wastes?

Yes ___ No ___ NA ✓

*PFLT = Paint Filter Liquids Test (Test Method 9095, EPA Publication No. SW-846)

If yes, list the wastes for which PFLT was used and provide the date of last test, identify the frequency of testing, and note any problems. Attach test results. (§268.7 (a)(5))

3. Does the generator treat restricted wastes in 90-day tanks or containers regulated under §262.34 (permissible in some states)?

Yes ___ No ✓ (If No, go to 4.)

Does the generator treat the wastes to meet appropriate treatment standards/prohibition levels?

Yes ___ No ___

If yes, has the generator prepared a waste analysis plan detailing the frequency of testing to be conducted? (§268.7(a)(4))

Yes ___ No ___ (If No, go to 4.)

Does the plan fulfill the following? (§268.7(a)(4)(i))

___ Based on a detailed chemical and physical analysis of a representative sample

___ Contains information necessary to treat the wastes in accordance with Part 268 requirements

Has the plan been filed with the Regional Administrator (return receipt, Federal Express slip, etc. required for verification)? (§268.7(a)(4)(ii))

Yes ___ No ___

Comments

4. Dilution Prohibition (§268.3):

a. Does the generator mix prohibited* wastes with different treatment standards?

*See Appendix C for distinction between restricted and prohibited wastes.

Yes ___ No ✓ (If No, go to b.)

List the wastes_____

Are the wastes amenable to the same type of treatment? (55 FR 22666)

Yes ___ No ___

Comments _____

b. Does the generator dilute prohibited wastes to meet treatment standard criteria, or render them non-hazardous? (55 FR 22665-22666)

Yes ___ No ✓ (If No, go to c.)

Check appropriate category:

___ Dilutes to meet treatment standards
___ Dilutes to render waste non-hazardous

Do the wastes fall into the following categories? (Check if appropriate.)

___ Characteristic wastes managed in treatment systems regulated under the Clean Water Act (§268.3(b)), (55 FR 22665)
___ Treatment standard specified in §§268.41 or 268.43

If the wastes do not fall into the above categories, briefly describe the conditions under which they were diluted.

_____

c. Based on an assessment of points a and b, and any other relevant circumstances, does the generator dilute prohibited wastes as a substitute for adequate treatment? (§268.3(a))

Yes ___ No ✓

Comments _____

MDD 985386143

5. F039 Multi-source leachate: Has the generator run an initial analysis for all constituents of concern in §§268.41 and 268.43? (55 FR 22620)

Yes ___ No ___ NA ✓

C. Management

1. On-Site Management

a. Are restricted wastes treated or (other than in a RCRA exempt unit) stored for greater than 90 or 180 days, or disposed on site?

Yes ___ No ✓

(If yes, the TSD Checklist must also be completed.)

Comments_____

b. If the generator treats characteristic wastes in systems regulated under the Clean Water Act, have the following been documented: the determination of restriction, how restricted wastes are managed, and why wastes discharged pursuant to an NPDES permit are not prohibited (if applicable)? (§268.7(a)(6)) (55 FR 22662)

Yes ___ No ___ NA ✓

c. If the generator treats characteristic wastes in RCRA exempt units to render them non-hazardous, are the wastes managed as restricted prior to entering the exempt unit (§268.7(a)(6)) until the applicable treatment standards are met?* (§268.9(d))

Yes ___ No ___ NA ✓

* This applies to both concentration based treatment standards specified in §§268.41 and 268.43, and to some §268.42 required methods which result in treatment below the characteristic level. See Appendix D.

d. If a waste is excluded from regulation or from the definition of solid or hazardous waste subsequent to the point of generation, does the generator comply with the requirements of §268.7(a)(6) (56 FR 3866-3867)? If the generator determines that he is managing a restricted waste that is excluded from the definition of hazardous or solid waste or exempt from Subtitle C regulation, under §§261.2-261.6 subsequent to the point of generation, is there a one-time notice in the facility's file stating such generation, subsequent exclusion from the definition of hazardous or solid waste or exemption from Subtitle C regulation, and the disposition of the waste?

2. Off-Site Management: Waste Exceeds Treatment Standards

a. Does the generator ship any waste that exceeds treatment standards/ prohibition levels (not subject to a national capacity variance) to an off-site treatment or storage facility?

Yes ✓ No ___ (If No, go to 3.)

Identify waste code(s) and off-site treatment or storage facilities to which wastes are shipped.

Waste Code	Receiving Facility
F006	Hotes. Horsehead Resource Development, Tenn.

Does the generator provide a notification to the treatment or storage facility? (§268.7(a)(1))

Yes ✓ No ___ (If No, go to 3.)

If the generator specifies alternative treatment standards for lab packs, is the certification required in §268.7(a)(8) or (9) included with the notification?

Yes ___ No ___ NA ✓

b. Is a notification sent with each waste shipment?

Yes ✓ No ___

If no, is the waste subject to a tolling agreement pursuant to §62.20(e) (small quantity generator only)?

Yes ___ No ___ (If No, go to 3.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

Waste Code	Subsequent Handler

Did the small quantity generator provide a notification to the receiving facility with the first waste shipment subject to the tolling agreement? (§268.7(a)(10))

Yes ___ No ___

MDD 985386143

3. Off-Site Management: Waste Meets Treatment Standards

a. Does the generator ship waste that meets treatment standards/prohibition levels to an off-site disposal facility?

Yes ___ No ✓ (If No, go to 4.)

Identify waste code(s) and off-site disposal facilities:

Waste Code	Receiving Facility

Does the generator provide a notification and a certification to the disposal facility? (§268.7(a)(2)(i) and (ii))?

Yes ___ No ___ (If No, go to d.)

b. Are a notification and a certification sent with each waste shipment?

Yes ___ No ___

If no, is the waste subject to a tolling agreement pursuant to §262.20(e) (small quantity generator only)?

Yes ___ No ___ (If No, go to c.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

Waste Code	Subsequent Handler

Did the small quantity generator provide a notification and a certification to the receiving facility with the first waste shipment subject to the tolling agreement? (§268.7(a)(10))

Yes ___ No ___

c. Are characteristic wastes which have been rendered non-hazardous shipped to a Subtitle D facility?

Yes ___ No ___ NA ___ (If No or NA, go to 4.)

Complete the following table:

Waste Code	Receiving Facility

Are a notification and a certification for each shipment sent to the Regional Administrator or authorized State? (§§268.9(d)(1) and 268.7(b)(5))?

Yes ___ No ___

4. Off-Site Management: Wastes Subject to Variances, Extensions, or Petitions

a. Does the generator ship wastes to a treatment, storage, or disposal facility which are subject to a national capacity variance (Part 268, Subpart C), or case-by-case extension (§268.5)?

Yes ___ No ✓ (If No, go to 5.)

Complete the following table:

Waste Code	Receiving Facility

Does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal? (§268.7(a)(3))

Yes ___ No ___

b. Is a notification sent with each waste shipment?

Yes ___ No ___

If no, is the waste subject to a tolling agreement pursuant to §262.20(e) (small quantity generator only)?

Yes ___ No ___ (If No, go to 5.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

Waste Code	Subsequent Handler

MDD 985386143

Did the small quantity generator provide a notification to the receiving facility with the first waste shipment subject to the tolling agreement? (§268.7(a)(10))

Yes ___ No ___

5. Records Retention

Does the generator retain on site copies of all notifications, certifications, and other relevant documents for a period of 5 years? (§268.7(a)(7))

Yes ✓ No ___

Are copies of relevant tolling agreements, along with the LDR notification and/or certification, kept on site for at least 3 years after expiration or termination of the agreement? (§268.9)

Yes ___ No ___ NA ✓

Do LDR documents reflect proper management of wastes previously covered under expired national capacity variances, case by case extensions and the soft hammer provision*?

Yes ___ No ___ NA ✓

* See Appendix B. Note that the soft hammer provision expired as of 05/08/90. Soft hammer wastes which had treatment standards established in the Third Third rule were granted a minimum 90-day national capacity variance to 08/08/90.

Comments_____

D. Treatment Using RCRA 40 CFR Parts 264 and 265 Exempt Units or Processes

1. Are restricted wastes treated in RCRA exempt units (e.g., distillation units, wastewater treatment tanks, elementary neutralization, etc.)?

Yes ✓ No ___ (If No, do not complete this section.)

List types of waste treatment units and processes:

Waste Code	Type of Treatment	Treatment Units and Processes
F006	cyanide destruction, metals precipitation	wastewater treatment system

2. Are treatment residuals generated from these units?

Yes ✓ No ___

Comments_____

3. Are residuals further treated, stored for greater than 90/180 days, or disposed on site?

Yes ___ No ✓ NA ___

(If yes, the TSD checklist must also be completed.)

E. Additional Comments, Concerns, or Issues Not Addressed in the Checklist:

Department of the Environment
Hazardous and Solid Waste Management Administration
2500 Broening Highway, Baltimore, Maryland 21224

Sequence #_____

Report of Observations

Type of Inspection/Observations: Compliance Evaluation Insp. Date 3/11/94

Facility Name: Mid-Atlantic Finishing Capitol Heights, Md.

Remarks: 4656 Addison Rd.

met w/ Mike Warner, environmental comp. mng

Facility is an electroplating operation operating with a pretreatment permit from WSSC. Major waste stream is F006 sludge generated from wastewater treatment of electroplating wastes.

Records required to be kept for Md. Hazardous Waste Regulations were reviewed and found to be in good order. Reviewed were: manifests and land disposal restriction notifications, annual reports, training records, contingency plan and emergency procedures. Training certificate for Mr. Warner was posted, but the documents required by COMAR 26.13.05.02 G need to be prepared.

The production area of the plant was inspected, as well as the wastewater treatment system where F006 sludge is generated. Storage areas for dry chemical and acids were inspected. Hazardous waste was stored in one cubic yard bags and was labelled, with the accumulation date. Inspections are done weekly and are documented.

A copy of the full inspection report will be provided to the company in about one week.

I received a copy of the company's waste minimization plan.

Observer: Douglas E. Frantz Person Interviewed: N/A

MDE 111
REV. 1/11/88

MID-ATLANTIC FINISHING, INC.

JOB DESCRIPTION

ENVIRONMENTAL COMPLIANCE MANAGER NAME: _____

Duties Include: Daily operation of wastewater treatment center to enure compliance with MID-ATLANTIC'S discharge permit. Individual to be trained for the handling, storage and shipping of RCRA listed hazardous wastes. Preparation of all reports for Federal, State and local authorities. Ensure compliance with OSHA standards. Update and maintain Contingency Plan and Spill Prevention and Countermeasure Plan. Help Train and direct employees in the safe handling of hazardous materials.

Education Requirements: Individual to be a licensed Industrial Class 6 Wastewaterworks Operator, be trained for RCRA requirements and be experienced in the safe handling of hazardous chemicals and waste.

Continuing Training: Annually, the C.E.O. of the company will review and certify the individual responsible for this position is aware and is diligently implementing the procedures for compliance to all Local, State and Federal regulations to the best of the Company's knowledge.

Closing: Attached, will be an employee profile which includes start dates or experience and training that has been completed by that employee.

Start Date:

Annual Review:
Date

Training Recieved:

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MID-ATLANTIC FINISHING, INC.

WASTE MINIMIZATION PROGRAM

INTRODUCTION: MID-ATLANTIC FINISHING, INC. has several measures in place to reduce the amount of hazardous waste generated where feasible. This program will state specificly what has been done in the past as well as the goals set for today and the future.

SCOPE: Areas that are involved are as follows:

a) Electroplating Solutions
b) Drag Out Tanks
c) Rinse Tanks
d) Metal Hydroxide from Precipitation
e) Ion Exchange

Minimization Procedures:

a) Electroplating Solutions: ALL solutions purchased are purchased with all environmental hazards taken into consideration. Any solution currently used that could be substituted by a less environmentally hazardous solution will be substituted where practical and economically feasible.

b) Drag Out Tanks: Electrolytic recovery is used on the following drag out tanks: Cadmium, Zinc, and Silver. The dragout tank on our Chrome plating tank is used to replenish the liquid level in that plating tank.

c) Rinse Tanks: All rinse tanks are flow restricted, at NO time are hoses or direct water flow to go into the rinse tanks. The less water used, the less water to treat, hence, less hazardous waste generation.

d) Metal Hydroxide: All metal hydroxide is processed through a drier, thus reducing its volume by some 60 to 80%. After drying, the material is sent to a recycler and is processed and returned to commerce as a useable product.

e) Ion exchange: Where more environmentally hazardous substance have to be used, the rinse tanks are recycled through ion exchange modules. The rinse water is cleaned and returned to the rinse tank. (i.e.. Cyanides and Hexavalent Chrome)

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Ion Exchange,Cont; The loaded module is sent out for regeneration and the regenerate is recycled.

Closing:

At this point, all waste generated is recycled, none is landfilled. Our water useage is at its lowest, any further cuts in water would affect the performance of our production department by increasing the reject rate. It is our understand that MAF, Inc. has implemented its waste minimization program to its fullest extent possible. If at any time,an opportunity arises to minimize our waste generation further, this company will investigate that opportunity.

B.J. Mason
President
Mid-Atlantic Finishing

Michael D. Warner
Environmental Compliance Mngr.
Mid-Atlantic Finishing